

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

CHEVELLE TINGEN,	:	
	:	
Plaintiff	:	
	:	
v.	:	Civil Action No. 02-4663
	:	
ROBERT L. ECKLIN, JR., ECKLIN	:	
DEVELOPMENT GROUP and DENNIS	:	
SCHOPF,	:	
	:	
Defendants	:	

**UNOPPOSED MOTION FOR EXTENSION OF TIME**

AND NOW COME all Defendants, by and through their counsel, Gary D.

Melchionni, Esquire and Stevens & Lee, and make the following motion for extension of time in which the parties to the above-referenced action are to be deposed, stating in support thereof as follows:

1. The undersigned counsel filed his Entry of Appearance with the Court on or about May 5, 2003. A copy of the Entry of Appearance is attached hereto.
2. Defendants' current counsel of record, Melvin E. Newcomer, has filed a Notice of Withdrawal as counsel of record from this action on or about May 5, 2003. A copy of the Notice of Withdrawal is attached hereto.
3. The undersigned counsel first met with Mr. Newcomer and received the files in this case on May 1, 2003.
4. The undersigned counsel has not yet had an opportunity to meet with any of the Defendants as of this date.
5. Over the next several weeks, the undersigned counsel has a 10(k) hearing scheduled with the National Labor Relations Board, several arbitration hearings, administrative agency fact finding conferences, and other legal and civic commitments, including two separate

meetings of the Board of Trustees of Duke University and the Board of Directors of the Duke Alumni Association in Durham, North Carolina, the first of which is from May 8th through the 11th and the second from May 15th through May 18th.

6. The depositions of both individual Defendants scheduled for May 6th and May 13th have been postponed.

7. Counsel for Plaintiff is not opposed to this motion on the basis of the undersigned counsel's recent entry into this action.

8. The undersigned counsel believes, and therefore avers, that the remainder of the discovery deadlines can be met taking into account the extension hereby requested.

9. For the foregoing reasons, Defendants respectfully request that the court grant a 21-day extension of time, or until June 20, 2003, in which the parties to this action are to be deposed.

Dated: May 6, 2003

Respectfully submitted,

STEVENS & LEE

By: \_\_\_\_\_  
Gary D. Melchionni  
25 North Queen Street  
Suite 602  
P.O. Box 1594  
Lancaster, PA 17608-1594  
(717) 291-1031

Attorneys for Defendants

